

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue Seattle, Washington 98101

Reply To Attn Of:

ECO-087

Brigadier General Robert H. Griffin U. S. Army Corps of Engineers North Pacific Division P.O. Box 2870 Portland, Oregon 97208-2870

Dear General Griffin:

In October 1996, the U.S. Army Corps of Engineers Corps), the National Marine Fisheries Service and the U.S. Environmental Protection Agency (EPA) met with representatives of states, tribes, federal agencies, and the Northwest Power Planning Council to discuss Columbia River and Lower Snake River mainstem water temperature issues. This meeting was an outcome of the August 12, 1996, letter (see Enclosure 1) sent to General Fuhrman requesting the initiation of discussions to address infractions of temperature water quality standards in the mainstem Columbia and Lower Snake River.

As a result of this meeting, the Corps invited the EPA to participate in the Snake River Recovery Plan Technical Management Team established to manage river operations consistent with the Endangered Species Act. EPA has made a special effort to participate in this and other Columbia Basin activities and has assigned a full time position to staff these activities. As a result of participation in the Technical Management Team, EPA has provided comments (see Enclosure 2) to the Corps on the *Draft 1997 Water anagement Plan for the Federal Columbia River Power System* calling for the need to achieve state water quality standards, promulgated under the Clean Water Act. Given the complexity of the Columbia Basin, this will require a long term strategy to decrease high water temperatures and interim measures for 1997 and beyond. The Technical Management Team has affirmed the need to address the need to meet water quality standards for temperature and some of EPA's comments have been included in the most recent draft of the Plan.

Given the importance of the temperature issue in overall ecosystem health of the Columbia River system, the authorities of EPA in implementation of the Clean Water Act and the role of the Corps in the management of the Federal Columbia River Power System, I would like to arrange a convenient time to meet personally with you to discuss these issues. I will be contacting you shortly to arrange this meeting.

Sincerely,

Chuck Clarke

Regional Administrator

Enclosures





## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue Seattle, Washington 98101

August 12,1996

REPLY TO ATTN OF:

OW-134 ··

General Russell L. Furhman US Army Corp of Engineers North Pacific Division P.O. Box 2870 Portland, OR 97208-2870

Dear General Furhman:

In recent weeks, the Environmental Protection Agency (EPA) has received several inquiries about exceedences of temperature water quality standards in the mainstem Columbia and lower Snake rivers, associated with the operation of the Corps of Engineers hydropower facilities. Specifically, lower Snake River temperatures have recently exceeded federally approved State water quality temperature standards of 20 °C (68 °F) at fish handling facilities and throughout the river. The purpose of this letter is to initiate a dialog about your perspective on the temperature issue and seek solutions to this problem. (This letter focuses on the temperature standard. However, due to the extensive history of concerns regarding the total dissolved gas (TDG) standard, we would like to include TDG issues in future discussions.)

Seasonal maximum water temperatures above permissible limits have been documented for a number of years resulting in the mainstem Snake and Columbia rivers being put on the Clean Water Act Section 303(d) list of water quality impaired waterbodies. These exceedences pose a significant risk to designated beneficial uses. The designated uses of concern are adult salmon that face thermal barriers to upstream migration and outmigrating juvenile salmon that are highly susceptible to the sublethal and lethal effects of elevated temperatures. Elevated summer and fall temperatures have been shown to be a significant limiting factor in the overall survival of Snake and Columbia Rivers salmon.

The National Marine Fisheries Service in the Proposed Recovery Plan for Snake River Salmon gave EPA primary responsibility for "reducing losses of listed species associated with poor water quality" (p. V-1-59). In our review of the proposed recovery plan we focused on the role of water quality in the survival of both juvenile (outmigration) and adult salmon. As we stated in our February, 1995 comments on the proposed recovery plan; resolution of water quality limitations to aquatic habitat in the Mainstem Columbia and its tributaries is key to both beginning and sustaining recovery efforts and should receive the highest priority in the implementation phase of the final plan. The proposed recovery plan states on page V-1-59 that "Implementation of appropriate standards should aid in increasing water quality, therefore improving habitat." We concur with this statement and feel that it is imperative that we begin discussions about solutions to water quality standard problems.



It is our understanding that several structural and/or operational options exist to remedy these exceedences and better protect juvenile and adult salmon. EPA believes that continued exceedences of established temperature standards is inconsistent with the Clean Water Act and the Endangered Species Act (as described in the Proposed Snake River Salmon Recovery Plan and the associated Biological Opinion). Combinations of corrective actions on the land and in the river are needed to protect our valuable salmon resources.

I am interested in learning your agency's perspective on this problem, any alternatives you may envision to remedy it, and any constraints you presently face that limit your ability to respond when such situations arise. I would welcome the opportunity to meet with you to chart a course, in association with Tribes and State agencies, for attainment of water quality standards in the mainstem Columbia an Snake rivers. I would appreciate a response to this letter and would find a meeting with appropriate staff useful. Please call me at (206) 553-1234 or Jack Gakstatter in the EPA Oregon Operations Office at (503) 326-2710 for further information or to help arrange a meeting.

Sincerely,

Chuck Clarke

Regional Administrator

cc. Will Stelle - National Marine Fisheries Service

John W. Keys III - Bureau of Reclamation

Ted Strong - Columbia River Inter-Tribal Fish Commission

Antone Minthorne - Confederated Tribes of the Umatilla Indian Reservation

Julia Davis - Nez Perce Tribal Council

Joseph Moses - Confederated Tribes of the Warm Springs Reservation

Eugene Greene Sr. - Confederated Tribes of the Warm Springs Reservation

Ross Sockzehigh - Yakama Indian Reservation

Mike Llewelyn - Washington Department of Ecology

Mike Downs - Oregon Department of Environmental Quality

Larry Koenig - Idaho Department of Environmental Quality

Jim Nielsen - Washington Department of Fish and Wildlife

Rudy Rosen - Oregon Department of Fish and Wildlife

Jerry Connely - Idaho Department of Fish and Game

John Etchart - North West Power Planning Council